

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	
Fairfield Sentry Limited, et al.,)	Chapter 15 Case
)	
Debtors in Foreign Proceedings.)	Case No. 10-13164 (SMB)
)	
)	Jointly Administered
)	
Fairfield Sentry Limited (In)	
Liquidation), et al., acting by)	
and through the Foreign)	
Representatives thereof,)	Adv. Pro. No. 10-03496 (SMB)
Plaintiffs,)	
)	Administratively Consolidated
-against-)	
)	
Theodoor GGC Amsterdam, et al.,)	
Defendants.)	
)	
This declaration applies to the)	
adversary proceedings listed in)	
Appendix A to Defendants’)	
Consolidated Reply)	
Memorandum of Law)	
in Further Support of)	
Defendants’ Renewed Motion to)	
Dismiss, dated June 19, 2020)	

**ATTORNEY DECLARATION OF CHRISTINE M. JORDAN
IN FURTHER SUPPORT OF DEFENDANTS’ RENEWED MOTION TO DISMISS**

I, Christine M. Jordan, hereby declare under penalty of perjury as follows:

1. I am duly licensed and admitted to practice law in the State of New York, and I am an associate with the law firm of Cleary Gottlieb Steen & Hamilton LLP, counsel for HSBC Institutional Trust Services (Asia) Limited, Robinson and Company, Murdoch and Company, Republic Nominees Limited (f/k/a HSBC Private Banking Nominee 1 (Jersey) Limited), HSBC Securities Services (Luxembourg) S.A., HSBC Private Bank (C.I.) Limited (f/k/a HSBC Private Bank (Guernsey) Limited), Republic Nominees Limited, HSBC Private Bank (Suisse) S.A., HSBC Bank USA, N.A., HSBC Trust Company AG (f/k/a HSBC Guyerzeller Trust Company

AG), HSBC Latin America Holdings (UK) Limited (successor-in-interest to HSBC Securities (Panama) S.A.), HSBC International Trustee Limited, Somers Nominees (Far East) Limited, and HSBC Bank Bermuda Limited. I respectfully submit this declaration as a supplement to the Consolidated Reply Memorandum of Law in Further Support of Defendants' Renewed Motion to Dismiss in the above-captioned proceedings.

2. Attached hereto as Exhibits A-B, for the Court's convenience, are true and correct copies of the following documents:

<u>Ex.</u>	<u>Document</u>
A	Custodian Agreement, Fairfield Sentry Limited and Citco Bank Nederland N.V. Dublin Branch and Citco Global Custody N.V., July 3, 2006
B	Brokerage and Custody Agreement, Fairfield Sigma Limited and Citco Bank Nederland N.V. Dublin Branch and Citco Global Custody N.V., August 12, 2003

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2020, at New York, New York.

/s/ Christine M. Jordan

CHRISTINE M. JORDAN